

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA	§	
	§	
vs.	§	No. 4:21-CR-289-O
	§	
HOLLIS MORRISON GREENLAW (01)	§	
BENJAMIN LEE WISSINK (02)	§	
CARA DELIN OBERT (03)	§	
JEFFREY BRANDON JESTER (04)	§	
	§	

**GOVERNMENT’S MOTION FOR LEAVE TO EXCEED
THE RESPONSE PAGE LIMIT**

The United States of America, by and through the undersigned Assistant United States Attorney, moves this Court for leave to file the government’s Omnibus Responses to Defendants Motions for Judgment of Acquittal and New Trial exceeding the 25 page limit.

On February 14, 2022, each defendant filed a Motion for Judgment of Acquittal pursuant to Rule 29 and a Motion for New Trial pursuant to Rule 33. (Dkts. 317 – 324). With the table of contents and authorities included, the defendants’ eight post-trial motions totaled approximately 249 pages. (*Id.*) Various of the issues are raised in multiple of the defendants’ motions. The government’s responses to the defendants’ post-trial motions are due on February 25, 2022. (Dkt. 335).

As previously noted by the government, the government is filing two responses, that is an Omnibus Response to the Defendants’ Motions for Judgment of Acquittal and an Omnibus Response to the Defendants’ Motions for New Trial. (Dkt. 334). The government’s omnibus responses are approximately 52 and 64 pages respectively. Under the Court’s Local Rules, a response should not exceed 25 pages without leave of court. *See* N.D. Tex. Crim. L.R. 47.2(c). While the Rules envision that “extraordinary and compelling reasons” may require briefs in

support of motions to exceed those page limitations, parties must obtain permission to file over-length briefs. *See id.* To effectively respond, the government requests leave to file its omnibus responses in excess of the Local Rules' 25 page limit.

Respectfully Submitted,

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s/ Tiffany H. Eggers
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CERTIFICATE OF CONFERENCE

I certify that I conferred with the below identified counsel for each defendant and counsel for defendants Greenlaw, Wissink, and Jester indicated, that they do not oppose the government's motion. As of the filing of this motion to exceed, the government has not received counsel for defendant Obert's position.

Paul Pelletier, attorney for Hollis Greenlaw;

Guy Lewis, attorney for Benjamin Wissink;

Neal Stephens, attorney for Cara Obert; and

Jeff Ansley, attorney for Brandon Jester.

s/ Tiffany H. Eggers
TIFFANY H. EGGERS
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2022, I electronically filed foregoing with the Clerk of Court for the United States District Court, Northern District of Texas, using the electronic case filing system of the Court. Counsel for the defendants will be sent a copy of this document automatically through the electronic filing system.

/s/ Tiffany H. Eggers
TIFFANY H. EGGERS
Assistant United States Attorney